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and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA	)	Cause No. CV 20-52-BLG-SPW
MAPLEY,	)	
	)	
Plaintiffs,	)	<b>JOINT STATEMENT OF</b>
	)	<b>INABILITY TO STIPULATE TO</b>
vs.	)	<b>ANY FACTS</b>
	)	
WATCHTOWER BIBLE AND	)	
TRACT SOCIETY OF NEW YORK,	)	
INC., WATCH TOWER BIBLE AND	)	
TRACT SOCIETY OF	)	
PENNSYLVANIA, and BRUCE	)	
MAPLEY SR.,	)	
	)	
Defendants.	)	

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Pursuant to L.R. 16.2(b)(3) and the Court's Order dated May 20, 2020 (Doc. 7), counsel for Plaintiffs Tracy Caekaert and Camillia Mapley, and counsel for Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), conferred and were unable to stipulate to any facts at the present time.

Pursuant to L.R. 11.2(a)(1), all counsel consent to the electronic filing of this Joint Statement of Inability to Stipulate to Any Facts by WTNY's counsel.

DATED this 13<sup>th</sup> day of July, 2020.

By: /s/ Ryan Shaffer  
Robert L. Stepans  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
*Attorneys for Plaintiffs*

By: /s/ Guy W. Rogers  
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Watch Tower Bible and Tract Society of  
Pennsylvania*

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 13, 2020, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
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3. Bruce G. Mapley Sr.  
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by the following means:

<u>1, 2</u> CM/ECF	<u>        </u> Fax
<u>        </u> Hand Delivery	<u>4</u> E-Mail
<u>3</u> U.S. Mail	<u>        </u> Overnight Delivery Services

By: /s/ Guy W. Rogers

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